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January 4th, 2024

Hon. Mag. Judge Rukhsanah I. Singh
United States Magistrate Judge for
The District Court
of New Jersey
Clarkson S. Fisher Bldg. & US Courthouse
402 East State Street
Trenton, NJ 08608

RE: *Johnson & Johnson Talcum Powder Products, Marketing, Sales Practices, and Products Liability Litigation.*

Case No.: 3:16-md-02738-FLW-LHG

This document relates to:

Patricia Dillard, Case No. 3:17-cv-03473

Joy C. Faust, Case No.: 3:17-cv-04369

Betty Hyche, Case No.: 3:17-cv-01118

Trudy Lehman, Case No.: 3:17-cv-07195

Sylvia Roberts et al. obo Theresa Randall, Case No.: 3:17-cv-02890

Linda Weseman, Case No.: 3:17-cv-01119

Dear Mag. Judge Singh:

I write this on behalf of the above-referenced plaintiffs with respect to J & J's PPF Deficiency Notice letter filed with the Court on December 14, 2023. (Dkt. No. 28797) and your MDL Text Order of December 18, 2023. (Dkt. No. 28820)

On April 20, 2021, the Court entered an Order directing the Plaintiffs to submit Plaintiff Profile Forms, medical authorizations, and certain core medical records on a rolling basis. See Order of April 20, 2021 (Dkt. No. 19911). The initial deadline for the service of the Profile Forms and Production of Documents was approximately October 20, 2021. LTL filed its petition for bankruptcy relief on October 14, 2021, in the Bankruptcy Court for the Western District of North Carolina. In re: LTL Management, LLC, 64 F.4th 84, 93 (3rd Cir. 2023). The bankruptcy was then transferred to the District of New Jersey.

All of the lawsuits pending in the J & J Talc MDL were stayed for approximately 21 months and were derailed pending bankruptcy court rulings. On January 30, 2023, the U.S Court of Appeals for the Third Circuit issued an opinion and judgment on January 30, 2023, directing that the first bankruptcy be dismissed. See *in re: LTL Management, LLC*, 64 F.4th 84 (3d Cir. 2023). Under the Third Circuit mandate, Judge Kaplan dismissed the first LTL bankruptcy on

April 4, 2023. Shortly following the dismissal of the first bankruptcy, LTL filed a second bankruptcy which Judge Kaplan dismissed on August 11, 2023.

On November 14, 2023, the undersigned was served with a letter advising them their Plaintiff Profile Forms were overdue. Although the Plaintiff Profile Forms, medical authorizations, and certain medical records were requested, some were returned signed but were not completely filled out. The plaintiffs' counsel's office has reached out to their clients, and his office has been working diligently to obtain completed Plaintiff Profile Forms. The holidays unfortunately have not made this an easy task. As of today's date, the Plaintiff Profile Forms in possession of the undersigned counsel for the following cases have been submitted to MDL Centrality: (1) Joy Faust, (2) Betty Hyche, (3) Trudy Lehman, and (4) Patricia Dillard.

On December 14, 2023, counsel for the defendant wrote this court a letter requesting a telephone conference. (Dkt. No. 28797).

According to the MDL TEXT ORDER a telephone conference has been set for January 10, 2024, at 11:00 a.m. with counsel for the defendants to initiate the calls. (Dkt. 28820). As such the undersigned counsel can be reached directly at 317.441.9229.

The undersigned hereby requests a 30-day extension up to and including February 4th, 2024, in which to upload their clients' completed Plaintiff Profile Forms, medical authorizations, and any medical records and death certificates in their possession to the MDL Centrality website.

Respectfully,

/s/ Michael J. Sobieray
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